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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUN 07 2016

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

2:16-CR-100-RMP

INDICTMENT

UNITED STATES OF AMERICA,
Plaintiff,

vs.

TERRY HUNT, MARY HUNT,
RUSSELL HUNT, and DEREK HUNT
Defendants.

Vio: 18 U.S.C. §§ 371,
922(a)(1)(A), 923(a)
Conspiracy to Deal
Firearms Without a
Firearms License

18 U.S.C. § 924(d)(1) and
28 U.S.C. § 2461(c)
Forfeiture Allegations

The Grand Jury charges that:

Beginning on an exact date unknown but by on or about June 12, 2011, and continuing through on or about December 2, 2015, in the Eastern District of Washington and elsewhere, Defendants TERRY HUNT, MARY HUNT, RUSSELL HUNT, and DEREK HUNT, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, both known and unknown, to commit the following offense against the United States, namely to engage in the business of dealing in firearms without a federal firearms license, in violation of 18 U.S.C. §§ 922(a)(1)(A),

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1 923(a), and one or more of the Defendants committed an overt act to effect the object of
2 the conspiracy, including but not exclusively, the sale of firearms alleged in Paragraphs A
3 through F of this Count, all said sales occurring between on or about June 12, 2011 and
4 on or about December 2, 2015, which are hereby incorporated by reference, all in
5 violation of 18 U.S.C. § 371.
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- 7 A. Sale of Smith and Wesson, Model Bodyguard, .380 Caliber Pistol, bearing
8 serial number EBR8323, purchased by MARY HUNT, and later sold on or
9 about August 17, 2012;
- 10 B. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number
11 AAWT524, purchased by TERRY HUNT and later sold on or about
12 November 14, 2014;
- 13 C. Sale of Smith and Wesson, Model M&P, 9mm Caliber Pistol, bearing serial
14 number HVS5690, purchased by TERRY HUNT and later sold on or about
15 August 14, 2015;
- 16 D. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number
17 ABEZ086, purchased by TERRY HUNT and later sold on or about August
18 14, 2015;
- 19 E. Sale of Smith and Wesson, Model Bodyguard, .38 Caliber Revolver, bearing
20 serial number CXZ3044, purchased by TERRY HUNT and later sold on or
21 about August 14, 2015;
- 22 F. Sale of Taurus, Model "The Judge," 45/410 Caliber Revolver, bearing serial
23 number BS632662, purchased by DEREK HUNT and later sold on or about
24 August 14, 2015.
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NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in the Indictment are hereby re-alleged and incorporated herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. §§ 922(a)(1)(A), 371, as set forth in Count 1 of this Indictment, Defendants TERRY HUNT, MARY HUNT, RUSSELL HUNT, and DEREK HUNT, shall forfeit to the United States, any firearms and ammunition involved in the commission, including, but not limited to:

Seized on or about November 13, 2015

1. Colt Unknown Revolver, Caliber: .38, SN: 229805;
2. Smith & Wesson 686 Revolver, Caliber: .357, SN: ADW7868;
3. Colt Ace Pistol, Caliber: .22, SN: 400521;
4. Smith & Wesson 19 Revolver, Caliber: .357, SN: 1K53943;
5. Colt SAA Revolver, Caliber: .45, SN: S28967A;
6. Ruger Bearcat Revolver, Caliber: .22 SN: 91-30370;
7. Smith & Wesson 27 Revolver, Caliber: .357 SN: N81284;
8. Smith & Wesson 41 Pistol, Caliber: .22 SN: 12923;
9. Beretta, Pietro S.P.A 86 Pistol, Caliber: .380 SN: G08577Y;
10. Beretta USA Corp 21A Pistol, Caliber: .22 SN: BCS27326U;
11. Rifles Inc., Caliber: 7mm, SN: S6269094;
12. Stevens Unknown Rifle, Caliber: .22LR, SN: K16;
13. Glock, Inc. 32 Pistol, Caliber: .357, SN: FDH648;
14. Ruger 10/22 Rifle, Caliber: .22, SN: 82102649;
15. Binelli Super Black Eagle Shotgun, Caliber: 12 gauge, SN: U121684;
16. Winchester 37 Shotgun, Caliber: .1410, SN: None;
17. Bond Arms Inc. Snake Slayer Derringer, Caliber: 45/410, SN: 62777;

18. Winchester 94 Rifle, Caliber: 25-35, SN: 1605994;
19. Winchester 94 Rifle, Caliber: .30, SN: 1396790;
20. Winchester 62A Rifle, Caliber: .22, SN: 353115;
21. Smith & Wesson M&P 15-22 Rifle, Caliber: .22, SN: DZY6082;
22. Ithaca Gun Co. Hammerless Shotgun, Caliber: 12 gauge, SN: 114666;
23. Colt Frontier Scout Revolver, Caliber: .22, SN: 180922F;
24. Remington Arms Company, Inc. 700 Rifle, Caliber: .280, SN: C6393169;
25. Barrett Firearms Mfg Co 99 Rifle, Caliber: .50 BMG, SN: 1688;
26. Uberti, Aldo 1873 Dakota Revolver, Caliber: .45, SN: 76158;
27. Browning Auto Rifle, Caliber: .22, SN: 12448PY146;
28. F.N. (FN Herstal) FNAR Rifle, Caliber: .762, SN: 319MN03564;
29. Sig-Sauer P220 Pistol, Caliber: .22, SN: G424321;
30. Ruger Creedmoor Rifle, Caliber: 6.5 mm, SN: 694-53677;
31. F.N. (FN Herstal) Mauser Rifle, Caliber: .270, SN: X0744
32. Ruger 10/22 Rifle, Caliber: .22, SN: 25080832;
33. Sako L61R Finnbear Rifle, Caliber: .30-06, SN: 518682;
34. Smith & Wesson Unknown Rifle, Caliber: .270, SN: 327054;
35. USA F MFG 22 Revolver, Caliber: .22LR, SN: 22835;
36. Sig Sauer (Sig-Arms) Sig M400 Rifle, Caliber: .556, SN: 20C047273;
37. Browning BL Rifle, Caliber: .22, SN: 71B32828;
38. Winchester 70 Rifle, Caliber: .257, SN: 43641;
39. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B091082;
40. Stag Arms Stag-15 Rifle, Caliber: .556, SN: 256668;
41. Miroku Firearm Co. Unknown Rifle, Caliber: Unknown; SN: 02178PN136;
42. Sako L61R Finnbear Rifle, Caliber: .375, SN: 509768;
43. Rock River Arms, Inc. LAR 15 Rifle, Caliber: .556, SN: LH104728;
44. Rifle Works, Caliber: 7mm, SN: C6598828;
45. Winchester 70 Rifle, Caliber: .30-06, SN: 287;
46. F.N. (FN Herstal) Mauser Rifle, Caliber 7mm, SN: X0307;
47. Lewis Machine and Tool Co. Defender 2000 Rifle, Caliber: .556, SN: 65056;
48. Juggernaut TactiCaliber, Inc. JT-10 Rifle, Caliber: .762, SN: B23970D;
49. Savage 11 Rifle, Caliber 6.5mm, SN: J825739;
50. Henry Repeating Rifle Company Golden Boy Rifle, Caliber: .22, SN: GB432946;
51. Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: .223, SN: BC-05242;

- 1 52. Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: 7mm, SN: BC-
04666;
2 53. Winchester 94 Rifle, Caliber: .30-30, SN: 6331790;
3 54. Great Guns 7mm Rifle, SN: S6237365;
4 55. Winchester M70 Rifle, SN: 271538;

5 Seized on or about December 2, 2015

- 6
7 56. Mossberg 464 Rifle, Caliber: .30-30, SN: LA061324;
8 57. Ruger Precision Rifle, Caliber: .308, SN: 1800-05104
9 58. Mossberg 151MB Rifle, Caliber: .22, SN: None;
10 59. Savage Arms, Inc., CD 42 Combination Gun, Caliber: .22/410, SN:
H856503;
11 60. Remington Arms Company, Inc., 700 Rifle, Caliber: 7mm, SN: S6387446;
12 61. Unknown Manufacturer AR15 Rifle, Caliber: .223, SN: D14382B;
13 62. Winchester 70 Rifle, Caliber: .30-06, SN: 374956;
14 63. Kimber Solo CDP Pistol, Caliber: 9mm, SN: S1140651;
15 64. Izhmash (IMEZ) Saiga-12 Shotgun, Caliber: 12 gauge, SN: H09412792;
16 65. Unknown Manufacturer AR15 Rifle, Caliber: .556, SN: D44812B;
17 66. Stonefire Arms, LLC, SFA-15 Rifle, Caliber: .556, SN: A100079;
18 67. Rock River Arms, Inc., LAR 15 Rifle, Caliber: .556, SN: CM74218;
19 68. Gaucha IGA Shotgun, Caliber: 20 gauge, SN: 862039;
20 69. Stag Arms Stag-15 Rifle, Caliber: 556 SN: 56185;
21 70. CZ USA 452 Scout Rifle Caliber: .22LR, SN: A096252;
22 71. Palmetto State Armory PA-15 Rifle, Caliber: .556, SN: LW130272;
23 72. Kimber Micro Carry Pistol, Caliber: .380, SN: T0014930;
24 73. Smith & Wesson PC1911 Pistol, Caliber: .45, SN: UCY0417;
25 74. Smith & Wesson 648 Revolver, Caliber: .22, SN: BHJ9249;
26 75. Smith & Wesson 642 Revolver, Caliber: .38, SN: CRA7616;
27 76. Smith & Wesson Bodyguard Revolver, Caliber: .38, SN: CXX5883;
28 77. Glock Inc., 17 Pistol, Caliber: 9mm, SN: TKC181;
78. Smith & Wesson 637-2 Pistol, Caliber: .38, SN: CRD6671;
79. Glock Inc. 43 Pistol, Caliber: 9mm, SN: ZXK553;
80. Sig-Sauer 1911 C3 Pistol, Caliber: .45, SN: GS79082;
81. Ruger LCR Revolver, Caliber: .38, SN: 543-03357;
82. Glock Inc. 21 Pistol, Caliber: .45, SN: HMM766;
83. Glock Inc. 42 Pistol, Caliber: .380, SN: ABHT193;

84. Ruger LCR Revolver, Caliber: .38, SN: 54329073;
85. Glock Inc. 43 Pistol, Caliber: 9mm, SN: BABS921;
86. Glock Inc. 19 Pistol, Caliber: 9mm, SN: WSW199;
87. Glock Inc. 19 Pistol, Caliber: 9mm, SN: RRU153;
88. Ruger LCR Revolver, Caliber: 9mm, SN: 549-61096;
89. Ruger LCR Revolver, Caliber: .38, SN: 542-20381;
90. Israel Weapon IND-IWI (Israel Military IND-IMI) Desert Eagle, Caliber: .50, SN: 95203762;
91. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS77;
92. Beretta USA Corp BU9 Nano Pistol, SN: NU094018;
93. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B108738;
94. Smith & Wesson M&P Caliber: 9mm, Pistol, SN: HWR2225;
95. Sig-Sauer P938 Pistol, Caliber: 9mm, SN: 52A024553;
96. Glock Inc. 32 Pistol, Caliber: .357, SN: ETL139US;
97. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS73;
98. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS78;
99. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS75;
100. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: 9mm, SN: 52B142772;
101. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: .22, SN: 52B051643;
102. Smith & Wesson M&P Caliber: 9mm, Shield Pistol, SN: HKC7899;
103. Taurus International The Judge Revolver, Caliber: .45/410, SN: IU158697;
104. Smith & Wesson 10-6 Revolver, Caliber: .38, SN: D996600;
105. Smith & Wesson 10-8 Revolver, Caliber: .38, SN: 9D89438;
106. Taurus International The Judge Revolver, Caliber: .45/410, SN: CP771584;
107. Smith & Wesson 10-5 Revolver, Caliber: .38, SN: C935163;
108. Colt Bisley Revolver, Caliber: .32, SN: 312059;
109. Smith & Wesson 63 Revolver, Caliber: .22, SN: 7145;
110. Glock Inc. 27 Pistol, Caliber: .40, SN: NDD346; and,
111. Smith & Wesson 66 Revolver, Caliber: .357, SN: CFT9446

If any of the property described above, as a result of any act or omission of any of the Defendants:

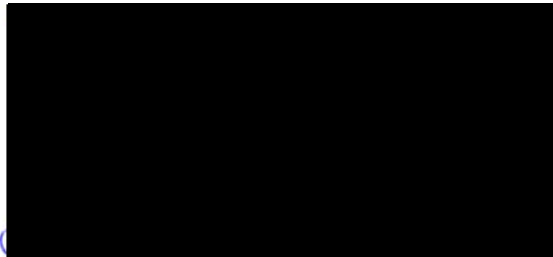
- (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

Dated this 7 day of June, 2016.

A TRUE BILL



Michael C. Ormsby

MICHAEL C. ORMSBY
United States Attorney

Aine Ahmed
Assistant United States Attorney